

Glynn Environmental Coalition

October 27, 2009

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A. Stanley Meiburg, Acting Administrator

U. S. EPA Region 4

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Mr. Meiburg,

Our community has a very simple request of EPA Region 4: appropriately test areas contaminated by toxaphene pesticide and report all the chemicals present. These contaminated areas are primarily in or near minority and low income neighborhoods and Elementary Schools.

Toxaphene, a now banned pesticide, was manufactured in Brunswick, Georgia, from 1948 to 1980 and disposed of in several landfills, and in our estuary; now this toxic waste is spread throughout our community, including two Superfund Sites, one of which is located next to Altama Elementary School. In 1991, the U.S. Environmental Protection Agency (EPA), the State of Georgia, and the Hercules Corporation, which manufactured the pesticide, met and agreed to change the analytical method for toxaphene to one that reported toxaphene and “some other product”. Our Coalition’s efforts resulted in the EPA Office of Inspector General (OIG) finding that the analytical method developed was inappropriate, and that it under-reported the amount of chemicals present; the OIG ordered a new and appropriate analytical method be developed. In response to the EPA OIG, EPA Region 4 and Georgia Environmental Protection Division published a paper in *Regulatory Toxicology and Pharmacology* advocating the reporting of only 3 of the 670+ chemicals in the toxaphene mixture. Even though the EPA OIG found the EPA Region 4 method would under-report the amount of chemicals present, EPA Region 4 has continued to advocate for methods that will either under-quantify or not report toxaphene chemicals present. The Glynn Environmental Coalition asked EPA Region 4 to retest,

by an appropriate analytical method, Altama Elementary School, which abuts a Superfund Site with toxaphene manufacturing wastes and has known releases to school property. Instead of testing by an appropriate method, EPA Region 4 did a presentation to the Board of Education that used the article from *Regulatory Toxicology and Pharmacology* to conclude that even if toxaphene was present on school property, the chemicals are not a human health risk.

Documents obtained from EPA Region 4 indicate that, in cooperation with Hercules Incorporated, efforts continue to develop and implement another analytical and risk assessment method that will only report a few of the chemicals present. We want appropriate testing conducted and all the chemicals present reported. Meanwhile, the risk to our school children and others exposed to toxaphene-contaminated soil, air, water, and seafood remain undetermined.

After the EPA OIG found the method to test for toxaphene in our community inappropriate, the GEC requested that EPA Region 4 re-sample Altama Elementary School that abuts the Hercules 009 Landfill Superfund Site, which has documented releases to the school property from the Superfund Site and has only received testing by the method found to be inappropriate and known to under-quantify toxaphene. Further requests to test the school were made by the Glynn County Board of Education. Instead of testing the school, the EPA Region 4 made a presentation to the Board of Education on January 29, 2008. In this EPA Region 4 presentation, based upon the Simon and Manning article, the EPA concluded that even if chemicals were present, they were not harmful to the elementary school students, and refused to re-test a school known to be contaminated and only tested by an inappropriate method.

Why does EPA Region 4 refuse to test Altama Elementary School and other areas tested by a method the EPA Office of Inspector General found inappropriate? We ask that without further delay that Altama Elementary school and neighborhoods be tested appropriately so we know our children and families are safe.

Daniel Parshley, Project Manager